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BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001 POSTAL RATE GREENING STANDARD AND THE GREE

DEC 6 1 21 PM '01

OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES

Docket No. R2001-1

KeySpan Energy's Fourth Set Of Interrogatories And Document Production Requests To USPS Witness Linda A. Kingsley

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice. KeySpan Energy submits the following interrogatories and document production requests to USPS witness Linda A. Kingsley: KE/USPS-T39-21. If the designated witness is unable to answer any of these questions, please direct them to the appropriate witness who can provide a complete response.

Respectfully submitted,

KevSpan Energy

Michael W. Hall 34693 Bloomfield/Road

Round Hill, Virginia 20141

540-554-8880

Counsel for

KeySpan Energy

Dated: Round Hill, VA December 6, 2001

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing discovery request upon the United States Postal Service, the Designated Officer of the Commission, and participants who requested service of all discovery documents, in compliance with the Commission's Rules of Practice.

Dated this 6th day of December 2001.

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KeySpan Energy's Fourth Set Of Interrogatories And Document Production Requests To USPS Witness Linda A. Kingsley

KE/USPS-T39-21 Please refer to your response to interrogatory KE/USPS-T39-3, where you confirm that the Postal Service met its goal of processing by automation 94.1% of all barcoded letters in the incoming secondary by FY 2001, the test year in the last case.

- A. Please provide the percentage of First-Class single piece machinable lettershaped pieces that was processed by automation in the incoming secondary in FY 2001.
- B. Please provide a projection for the test year of this case for the percentage of First-Class single piece machinable letter-shaped pieces that will be processed by automation in the incoming secondary.